



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

US EPA RECORDS CENTER REGION 5



486214

REPLY TO THE ATTENTION OF

SE-5J

August 11, 2003

VIA FACSIMILE AND MAIL

Mr. Joseph R. Podlewski, Jr.
Schwartz, Cooper, Greenberger & Krass
180 North LaSalle Street
Chicago, IL 60601

Ms. Susan T Morakalis
Metropolitan Water Reclamation District of Greater Chicago
100 East Erie Street
Chicago, IL 60611

Mr. Lawrence L. Fieber, P.G.
Project Manager, Burns & McDonnell
2601 West 22nd Street
Oak Brook, IL 60523

Re: Completion of On-site Work under Administrative Order by Consent No. V-W-'01-C-653 for the J-Pitt Melt Shop Site, Chicago, Cook County, Illinois

Dear Sir or Madam:

On April 5, 2001, the City of Chicago Department of Environment (CDOE) discovered artillery shells at the former J-Pitt Melt Shop site located at 3151 South California Avenue in Chicago, Illinois. CDOE also observed an oil sheen on the water in the Chicago Sanitary and Ship Canal near the south property line. CDOE requested and received assistance from the U.S. EPA and the U.S. Army to remove the artillery shells and referred the site to the U.S. EPA. U.S. EPA initiated an emergency response due to site conditions which posed an immediate threat to human health and the environment.

On April 6, 2001, U.S. EPA mobilized Ferguson Harbor, Inc., to the site to initiate emergency actions. In addition, the U.S. EPA and Illinois Department of Nuclear Safety (IDNS) performed a radiation survey of the site building, and identified five sources of radioactive material, specifically Cesium-137. U.S. EPA performed and guided various response actions at the site from April 5 through April 18, 2001, and identified potential hazardous substances within the facility which included: resinous material containing 54,000 ppm of polychlorinated biphenyls (PCBs); electric arc furnace dust (K061) located in the baghouses within and outside the facility; heavy metals in dust and ash primarily in the furnace and billet finishing areas; drums and containers with acids, caustics, oils, and solvents staged in the northern portion of the building; Cesium-137 in mold level control devices; and pipe insulation suspected to contain friable asbestos.

On April 6, 2001, U.S. EPA issued a general notice of potential liability to the potentially responsible parties (PRPs) Metropolitan Water Reclamation District of Greater Chicago (MWRDGC) and M.S. Kaplan Company. On April 10, the PRPs responded that they would perform work necessary to abate the release, or threat of release, of hazardous substances at the site. A final Administrative Order by Consent (AOC) was signed on August 3, 2001.

On September 17, 2001, the PRPs' contractor Burns & McDonnell received approval of the Work Plan and initiated response activities. Monthly progress reports were submitted, totaling 16 reports summarizing work completed under the AOC. The PRPs submitted a Final Report to the U.S. EPA on February 21, 2003. The following sections of that report summarize the method of completion of each area of the investigation of the site:

Drums and Containers - approximately 196 drums and 293 containers of various materials were screened, analyzed, and categorized for appropriate disposal. The categorized materials were sent to an appropriate facility for disposal.

Baghouse Units - two baghouse units were evaluated and remediated, generating 35 tons of K061 dust, twenty-six 55-gallon drums of rinsate water and one roll-off container of contaminated debris, which were sent to an appropriate disposal facility.

Former Process Pits - water in six process pits/sumps were sampled and evaluated for potential exposure concerns. Standard risk assessments were conducted based on the substances found and concluded that surface water from the former process pits is unlikely to pose appreciable human health risk. No further action was required.

Damaged Dry Goods - the damaged product materials were evaluated and confirmed to be non-hazardous and therefore do not require disposal to comply with the AOC. No further action was required.

Radioactive Source Materials - four exempt radioactive source rods located within the billet caster molds, and ten radioactive wear indicator needles were evaluated, checked for leakage, packaged and sent for appropriate disposal.

Pipe Insulation Debris - one bag containing approximately one-half cubic foot of pipe insulation and clean-up debris (35% amosite) was generated from the remediation of the fallen pipe wrap. The asbestos-containing material was removed for appropriate disposal.

Resinous PCB Material - surface samples were collected in the vicinity of the leaking PCB capacitor after it was containerized during the initial response work. Results were below the 25 ppm clean up level for low occupancy areas and therefore no additional work was required.

Slag Piles - the two outside slag piles were sampled and evaluated utilizing a streamlined risk assessment, which concluded the piles are non-hazardous and unlikely to pose an appreciable human health risk. No further action was required.

Surface and Subsurface Soils - surface and subsurface samples were collected and analyzed for heavy metals likely to be present at the site. Results were evaluated utilizing a streamlined risk assessment and blood lead exposure model, which concluded that onsite soils are unlikely to pose an appreciable human health risk. No further action was required.

Subsurface Oil Release - four test pits were excavated to investigate the ongoing oil release into the canal. Analytical results identified low levels of PCBs and total petroleum hydrocarbons (TPHs) as Oil in all of the test pits with one pit containing free-product. Based on the depth of the oil-impacted soil and the analytical results, the source of the TPH and PCBs identified in the test pit samples appears to be a petroleum source rather than a transformer oil spill from the transformer switch gear room. The investigation was completed pursuant to the AOC, but the PRP is coordinating with the Illinois EPA to address the oil release issue.

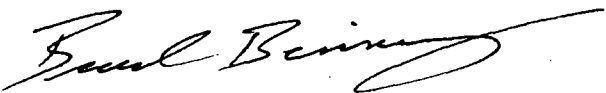
Munitions - PRPs made arrangements for the disposal of munitions through the ATF by the U.S. Army "EOD Unit" from Fort McCoy, Wisconsin.

Based on my oversight of the respondents activities at the site, my review of the final report, and a final inspection of the site performed on July 31, 2003, I conclude that the respondents have completed the work required by the Order.

This notice of completion in no way releases the Respondents from any potential future obligations to perform additional work to address the same or other conditions at the site. Similarly, this notice of completion does not release Respondents from any record keeping, payment, penalties for any violation of the Order, or other obligations that extend beyond the date of this notice.

Please contact me at (312) 353-7613 or Stuart Hersh, Office of Regional Counsel, at (312) 886-6235 if you have any questions or comments regarding this letter.

Sincerely,



Brad Benning
On-Scene Coordinator

cc: S. Jansen (SE-5J)
S. Hersh (C-14J)
File